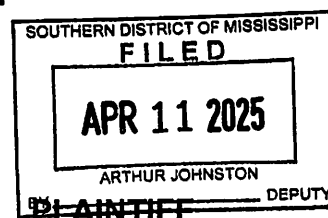


**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**



Parents (AMENDED)

VS.

Civil Action No. 3:25-cv-71-HTW-LGI

Jackson Public School & MS Department of Education DEFENDANTS
Errick Greene, Alvanette Buchanan, Bruce Sloan,
Veneatha Corey, Laura Bush, Lance Evans & Parent Engagement

COMPLAINT

COMES NOW, plaintiff, Vicki L. Chaney Gooden, pro se, and for cause of action
against the defendants, Errick Greene, Alvanette Buchanan, Bruce Sloan,
Veneatha Corey, Laura Bush, Lance Evans and Parent Engagement, would
state: JURISDICTION

This complaint has been filed in violation of parents and students rights in
regards to education of COPPA, Civil Rights Act of 1964 VII, NO CHILD LEFT
BEHIND ACT, FERPA and IDEA.

Errick Greene, Superintendent for Jackson Public Schools, failure to notify
parents rights to transfer students from this failing Middle School. Greene failed
to annually notify parents of rights to view educational records, oversee
academic performance by working with parents, failure to create a positive
learning environment, failure to create a balance of leadership and
communication skills and has violated parents and students rights. Green failure
to implement federal education laws effectively or oversee instruction of failing
schools, failure to provide process of appealing and selecting special programs
and process of selecting staff to serve on panels for entrance, failure to provide
information about failing school transfers. Furthermore, Greene failed to protect
the "special population," not limited to. Greene knew or should have known.

Alvanette Buchanan, Assistant Middle School Superintendent for Jackson
Public Schools, failure to oversee the implementation of assessment used to

evaluate class and accelerated benchmark rankings. Buchanan failed to oversee the performance of the Middle School principal. Buchanan denied Exceptional Education representation for the conference, even after the request was made prior, violated parents and students rights, not limited to. Buchanan knew or should have known.

Bruce Sloan, Principal at Cardozo Middle School, failed to provide a positive and safe learning environment; foster an inclusive climate where student feels valued and empowered; managed school staff effectively; implement and maintain curriculum standards based on the law; allowing students to be labeled or identified by ranked categories by benchmarks and classroom arrangements; communicate effectively with parents about changes in the learning process; refused to have an Exceptional Education representative present during any conferences for those with IEP's; abuse of power through intimidation by conferencing only with administrative staff and violated parents and students rights, not limited to. Sloan knew or should have known.

Veneatha Corey, Counselor at Cardozo Middle School, failure to support student academics, social and emotional development. Corey failed to promote a safe and nurturing environment for students; violated student rights by issuing accelerated changed schedules and identifying or labeling students into ranked classrooms, not limited to. Corey knew or should have known.

Laura Bush, Teacher/Librarian at Cardozo Middle School, failure to foster positive learning environment; violated technology privacy; failure to thoroughly sinvestigate misuse of electronic school device, failure to notify law enforcement of potential threats; failure to provide parents with a comprehensive emergency plan for off-campus incidents; failure to communicate effectively with parents, not limited to. Bush knew or should have known.

Lance Evans, Mississippi State Superintendent, failure to implement federal education laws effectively, failure to hold this school district accountable for student achievement; failure to provide information on transferring students from failing schools Section 37-167-1; abuse of power through Compulsory Schools to intimidate; failure to supervise staff in compliance to public schools advocates; failure to make presence at failing schools, ensure the district are not violating any laws into any special programs, not limited to. Evans knew or should have known.

Parent Engagement, Mississippi Department of Education Advocate Center, Failure to actively participate, communicate and collaborate between school and parents and students with IEP's, not limited to. The Parent Engagement Center knew or should have known.

I.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Errick Greene, is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Alvanette Buchanan is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Bruce Sloan, is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Veneatha Corey is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Laura Bush is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Lance Evans is an adult resident citizen of the County of Hinds. State of Mississippi.

Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Parent Engagement is an adult resident citizen of the County of Hinds. State of Mississippi.

FACTS

Students in this public middle school district have been

placed in classroom order by identifying and labeling as, Team A and Team B, based on an academic ranking. Students are sometimes demoted or promoted the next school term based on grades. Their schedules have been changed during the middle of a school term and placed into accelerated classes based on their benchmark scores. Students have been demoted or promoted into these accelerated classes out of retaliation for parents suing and/or filing complaints. Students have been discriminated against from single subject testing areas of accelerated classes due to benchmark rankings. Students, who have IEP's have been denied Exceptional Education Representatives at conferences based on educational needs and entrance into "special school program." Students, who have IEP's have been denied representatives by the district to supervise on field trips. Students have been denied school counseling due to bullying incidents. Student emails and passwords have been shared with staff on school issued laptops. These unsecured laptops have several breach issues, which allows students' activity to be vulnerable to other acts. Students have been discriminated against to transfer from failing schools to another school within the district. Students have been discriminated and retaliated against for filing complaints with the district.

Furthermore, parents have not been informed of their rights to transfer students from a failing school and either denied or ignored any written requests. Parents have been denied class work in the absence of students by request. Parents have not been informed of such accelerated classes and scaling for identifying grade levels. Parents have not been informed of their rights to have


an Exceptional Education Representative for students, who have IEP's, at any conference about student educational purposes and have been denied representation even after requesting before any conferences. Parents have not been informed of any crisis management plans for school issued devices for after hours incidents or made aware of potential camera evasion at home. Parents have not been informed of "in-house" administrative panels for entrance into special schools, such as APAC, or the appeal process. Parents have been denied or ignored appeal process requests and retaliated against for either suing or filing complaints against the district. Parents have not received any assistance from the state's advocate department, who works as liaison between schools and parents. Parents have been intimidated by abuse of power from administration. Parents have been discriminated against for filing complaints and suing the district. Parents have been denied or ignored requests for school to utilize counselor services due to bullying incidents.

Students have been bullied as a result of being demoted into these accelerated classes and classroom rankings. Students have suffered emotional distress and mental anguish from such acts, such as physical pain, lack of desire to attend school, not limited to. Students have been dismissed from school until a mental health intake has been performed. Students have been violently attacked and had to seek medical treatment..

Parents have suffered emotional and mental anguish, not limited to.
RELIEF

Parents are seeking the maximum amount allowed, but not limited to \$200,000.00.

Respectfully submitted, this the 11 day of April 2025. AMENDED



Plaintiff

Parents
Vicki L. Chaney Gooden
3071 Suncrest Drive
Jackson, MS 39212
601-882-7189